

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**GEORGE WELCH**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.: 3:20-cv-00122-NBB-JMV**

**CITY OF HERNANDO, MISSISSIPPI,  
ET AL.**

**DEFENDANTS**

**MUNICIPAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Municipal Defendants the City of Hernando, Joseph Harris, and Robert Scott, in their individual and official capacities, move to dismiss Plaintiff George Welch's ("Plaintiff") complaint pursuant to Federal Rule of Civil Procedure 56. The contemporaneously filed memorandum in support explains in detail the bases for the requested relief.

In addition to the memorandum, Municipal Defendants offer the following exhibits in support:

Exhibit "A" – George Welch Deposition Transcript Excerpts

Exhibit "B" – Dispatch Log

Exhibit "C" – Joseph Harris Deposition Transcript Excerpts

Exhibit "D" – Pictures of Vehicle

Exhibit "E" – Taser Log

Exhibit "F" – Pictures of Alleged Injuries

Exhibit "G" – Incident Report

Exhibit "H" – Hernando Municipal Court Orders

Exhibit "I" – Notice of Appeal

Exhibit "J" – County Court of DeSoto County Transcript Excerpts

Exhibit "K" – George Welch Discovery Responses

Exhibit “L” – Bankruptcy Schedule

Exhibit “M” – County Court of DeSoto County Order

For the reasons articulated in the memorandum, Municipal Defendants respectfully request an order of dismissal.

Dated: June 22, 2021

Respectfully submitted,

**PHELPS DUNBAR, LLP**

BY: /s/ G. Todd Butler

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**ATTORNEYS FOR MUNICIPAL  
DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that, on June 22, 2021, I had a copy of this document electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

*/s/ G. Todd Butler*

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G. TODD BUTLER